

McCormick, Barstow, Sheppard,
Wayte & Carruth LLP
H Annie Duong, #319953
annie.duong@mccormickbarstow.com
7647 North Fresno Street
Fresno, California 93720
Telephone: (559) 433-1300
Facsimile: (559) 433-2300

Attorneys for Creditor
PHILIP VERWEY d/b/a
PHILIP VERWEY FARMS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In Re
PG&E CORPORATION
and
PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Bankruptcy Cases
19-30088-DM (Lead Case)
19-30089-DM

(Jointly Administered)

**NOTICE OF HEARING ON PHILIP
VERWEY FARMS' MOTION FOR RELIEF
FROM AUTOMATIC STAY TO EXERCISE
SETOFF PURSUANT TO 11 U.S.C. §§ 362
AND 553**

☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Corporation
☒ Affects both Debtors

(11 U.S.C. §§ 362(d), 553(a), 562)

**All papers shall be filed in the Lead Case
No. 19-30088 DM

PLEASE TAKE NOTICE, that Creditor Philip Verwey d/b/a Philip Verwey Farms ("PVF")
has filed a motion for relief from automatic stay pursuant to 11 U.S.C. § 362(d)(1) to exercise a setoff
against Debtor Pacific Gas and Electric Corporation (hereinafter "Motion").

PLEASE TAKE NOTICE, that the Motion is based on the Memorandum of Points and
Authorities filed concurrently, the Declaration of Philip Verwey In Support Of Motion For Relief
From Automatic Stay To Exercise Setoff and the attachments and exhibits thereto, and on other and
further evidence the Court may consider at or before any hearing on the Motion.

1 **PLEASE TAKE NOTICE**, that the Motions are set for hearing on April 23, 2019, at 9:30
2 a.m., before the Honorable Dennis Montali at the United States Bankruptcy Court for the Northern
3 District of California, San Francisco Division, located at 450 Golden Gate Avenue, 16th Floor,
4 Courtroom 17, San Francisco, CA 94102.

5 **PLEASE TAKE NOTICE**, that any responses or objections to the Motion shall be in writing
6 and conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the
7 Northern District of California, shall be filed with the Bankruptcy Court in accordance with the
8 customary practices of the Bankruptcy Court, and shall be served on:

- 9 (a) Chambers of the Honorable Judge Dennis Montali;
- 10 (b) The Standard Parties as required by the Order Implementing Certain Notice and
11 Procedures and Case Management Procedures;
- 12 (c) Counsel for PVF, McCormick Barstow LLP ATTN: Annie Duong
13 (annie.duong@mccormickbarstow.com), 7647 N. Fresno St., Fresno, CA 93720; and
- 14 (d) All other parties requesting notice pursuant to Rule 2002 of the Federal Rules of
15 Bankruptcy Procedure,

16 to be filed or received no later than fourteen (14) days after service of the Motion at 4:00 pm (PST).

17 **PLEASE TAKE NOTICE**, that as provided by Local Rule 4001-1(a), the Debtor, Pacific Gas
18 & Electric Company, is advised to appear personally or by counsel at the preliminary hearing; and that
19 failure to appear may result in the Court granting the relief requested by this Motion without further
20 hearing, including the lifting of the automatic stay for PVF to effectuate a setoff against its prepetition
21 claims against the Debtor.

22

23 Dated: March 29, 2019

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

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25

26 By: /s/ H. Annie Duong
27 H Annie Duong
28 Attorneys for Creditor
PHILIP VERWEY d/b/a
PHILIP VERWEY FARMS